

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LUIS SOUSA,

Plaintiff,

v.

SEEKONK SCHOOL COMMITTEE;
RICH DROLET, in his personal and
official capacities; KIMBERLY SLUTER,
in her personal and official capacities,

Defendants.

Civil Action No. 1:22-cv-40120-IT

**PLAINTIFF'S MOTON FOR LIMITED
EXPEDITED DISCOVERY**

Plaintiff Luis Sousa ("Sousa") only discovered on Dec. 12, 2022 that there are security cameras observing the area where a disputed event took place. Accordingly, Sousa respectfully moves this Court for leave to conduct limited expedited discovery in order to obtain the footage from this camera, as it would have the effect of immediately controverting the facts presented by Defendants and confirming the facts presented by Plaintiff in this action. Discovery is needed at this juncture because a status hearing on Plaintiff's Renewed Motion for a Temporary Restraining Order and for a Preliminary Injunction is scheduled for December 22, 2022. In the alternative, the Court could compel the Defendants to provide this video footage or an explanation as to why it no longer exists to the Court at least 24 hours prior to the hearing on the motion for preliminary injunction. Plaintiff recognizes that if it is produced, for the first time at such a late date, it could contain information that surprises Plaintiff, but Plaintiff is so confident of what it will show that he is willing to bear that risk.

CERTIFICATION

Pursuant to L.R. 7.1(a)(2), undersigned counsel certify that they have attempted in good faith to confer with Defendants, and Defendants have not responded despite repeated attempts to engage them on this issue.

Dated: December 13, 2022.

Respectfully Submitted,

/s/ Marc J. Randazza

Marc J. Randazza, BBO# 651477

mjr@randazza.com, ecf@randazza.com

Jay M. Wolman, BBO# 666053

jmw@randazza.com

Robert J. Morris, II (*pro hac vice*)

rjm@randazza.com

RANDAZZA LEGAL GROUP, PLLC

30 Western Avenue

Gloucester, MA 01930

Tel: (978) 801-1776

Attorneys for Plaintiff
Luis Sousa

RANDAZZA | LEGAL GROUP

CERTIFICATE OF SERVICE

I hereby certify that on December 13, 2022 the foregoing document was served on all parties or their counsel of record through the CM/ECF system.

/s/ Marc J. Randazza
Marc J. Randazza

RANDAZZA | LEGAL GROUP